

## The Honorable Judge Settle

**UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WASHINGTON  
AT TACOMA**

LAURA L. TIMLICK, )  
Plaintiff, )  
v. )  
BANK OF AMERICA, N.A., a foreign )  
corporation; RESIDENTIAL CREDIT )  
SOLUTIONS, INC., a foreign corporation; )  
THE BANK OF NEW YORK MELLON, fka )  
The Bank of New York, as Trustee for the )  
Certificateholders of CWMBS, Inc., CHL )  
Mortgage Pass-Through 2007-10, a national )  
association; RENEE M. PARKER, a resident )  
of California; and NORTHWEST TRUSTEE )  
SERVICES, INC., a Washington corporation, )  
Defendants. )

) No. 16-05797-BHS  
)

**MOTION BY RCO LEGAL, P.S. TO  
WITHDRAW AS COUNSEL FOR  
DEFENDANT NORTHWEST TRUSTEE  
SERVICES, INC.**

**NOTING DATE: DECEMBER 22, 2017**

## I. MOTION

Pursuant to LR 83.2, RCO Legal, P.S. (“RCO”) moves to withdraw as counsel for Defendant Northwest Trustee Services, Inc. (“NWTS”) in the above-entitled action. The withdrawal is at the client’s request for the reasons set forth herein.

## II. ARGUMENT

The undersigned has been informed that RCO Legal, P.S. is closing all offices in Washington and nationwide, and his employment with RCO Legal, P.S. will be terminated as of December 12, 2017. NWTS has been informed of the firm's closure as well as the

consequences of the proposed withdrawal from representation, and as client, has consented to the withdrawal.

Pursuant to LR 83.2(1), the address for further pleadings and/or correspondence to be served upon NWTS in this case is: c/o General Counsel, 13555 S.E. 36<sup>th</sup> St., Ste. 100, Bellevue, WA 98006, with a phone number of 425-586-1900.

As shown in the attached declaration of service, NWTS has been provided with a copy of this Motion and the proposed order.

### III. CONCLUSION

For the foregoing reasons, RCO respectfully submits that this Motion to Withdraw should be granted.

DATED this 6<sup>th</sup> day of December, 2017.

RCO LEGAL, P.S.

By: /s/ Joshua S. Schaer

Joshua S. Schaer, WSBA #31491

Attorney for Defendant Northwest Trustee Services, Inc.

## **Declaration of Service**

The undersigned makes the following declaration:

1. I am now, and at all times herein mentioned was a resident of the State of Washington, over the age of 18 years and not a party to this action, and I am competent to be a witness herein.

2. On December 7, 2017 I caused a copy of the MOTION BY RCO LEGAL, P.S. TO  
WITHDRAW AS COUNSEL FOR DEFENDANT NORTHWEST TRUSTEE SERVICES, INC.

and PROPOSED ORDER to be served to the following in the manner noted below:

V. Omar Barraza Barraza Law, PLLC 14245-F Ambaum Blvd. SW Seattle, WA 98166	<input checked="" type="checkbox"/> US Mail, Postage Prepaid <input type="checkbox"/> Hand Delivery <input type="checkbox"/> Overnight Mail <input type="checkbox"/> Facsimile <input checked="" type="checkbox"/> CM/ECF Electronic Service
Attorneys for Plaintiff	
Michael J. Kapaun Steven J. Dixson Witherspoon Kelley 422 W. Riverside Ave., Suite 1100 Spokane, WA 99201	<input checked="" type="checkbox"/> US Mail, Postage Prepaid <input type="checkbox"/> Hand Delivery <input type="checkbox"/> Overnight Mail <input type="checkbox"/> Facsimile <input checked="" type="checkbox"/> CM/ECF Electronic Service
Attorneys for Defendants Bank of America, N.A. and The Bank of New York Mellon	
Northwest Trustee Services, Inc. 13555 S.E. 36 <sup>th</sup> St., Ste. 100 Bellevue, WA 98006	<input type="checkbox"/> US Mail, Postage Prepaid <input checked="" type="checkbox"/> Hand Delivery <input type="checkbox"/> Overnight Mail <input type="checkbox"/> Facsimile
Defendant	
Lucasz I. Wozniak Wright Finlay & Zak, LLP 4665 MacArthur Court, Suite 200 Newport Beach, CA 92660	<input checked="" type="checkbox"/> US Mail, Postage Prepaid <input type="checkbox"/> Hand Delivery <input type="checkbox"/> Overnight Mail <input type="checkbox"/> Facsimile <input type="checkbox"/> Email <input checked="" type="checkbox"/> CM/ECF Electronic Notice
Attorneys for Defendants Residential Credit Solutions, Inc. and Renee Parker	

11

11

11

1 I declare under penalty of perjury under the laws of the state of Washington that the  
2 foregoing is true and correct.

3 Signed this **7th** day of December, 2017.  
4

5 /s/ Ali Small  
6 Ali Small, Paralegal

7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26